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18 Attorneys for Plaintiffs  
 CORY SPENCER, DIANA MILENA  
 19 REED, and COASTAL PROTECTION  
 20 RANGERS, INC.

21 **UNITED STATES DISTRICT COURT**  
 22 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
 23

24 CORY SPENCER, an individual;  
 25 DIANA MILENA REED, an  
 individual; and COASTAL  
 26 PROTECTION RANGERS, INC., a  
 27 California non-profit public benefit  
 corporation,  
 28

CASE NO. 2:16-cv-02129-SJO (RAOx)

**DECLARATION OF BLAKE WILL IN  
 SUPPORT OF PLAINTIFFS' MOTION  
 FOR CLASS CERTIFICATION**

Complaint Filed: March 29, 2016  
 Trial Date: November 7, 2017

1 Plaintiffs,

2 v.

3 LUNADA BAY BOYS; THE  
4 INDIVIDUAL MEMBERS OF THE  
5 LUNADA BAY BOYS, including but  
6 not limited to SANG LEE, BRANT  
7 BLAKEMAN, ALAN JOHNSTON  
8 AKA JALIAN JOHNSTON,  
9 MICHAEL RAE PAPAYANS,  
10 ANGELO FERRARA, FRANK  
11 FERRARA, CHARLIE FERRARA,  
12 and N. F.; CITY OF PALOS  
13 VERDES ESTATES; CHIEF OF  
14 POLICE JEFF KEPLEY, in his  
representative capacity; and DOES  
1-10,

15 Defendants.

Judge: Hon. S. James Otero

Date: February 21, 2017

Time: 10:00 a.m.

Crtrm.: 10C

First Street Courthouse

15 I, Blake Will, declare as follows:

16 1. I grew up in Palos Verdes and lived there from the age of 5 to  
17 18. I attended Miraleste High School and the University of Southern  
18 California. After I graduated from college, I moved to Manhattan Beach,  
19 where I lived until I was 25 years old. I currently reside near Hartford,  
20 Connecticut. I own a marketing agency that builds websites. I have  
21 personal knowledge of the matters stated in this declaration and, if called as  
22 a witness, I could and would testify competently as to its contents.

23 2. I started surfing when I was a teenager. There are many good  
24 places to surf in Palos Verdes Estates, like Haggerty's and Indicator, but in  
25 my opinion none of them are as special as Lunada Bay. Lunada Bay does  
26 not compare to other surf locations because Lunada Bay is primarily a right  
27 hand point break that can handle any size swell when the conditions are  
28 right. Haggerty's and Indicator break left and are not as sheltered so they

1 not are protected from the wind. Lunada Bay is also just a nice pleasant  
2 bay.

3       3. Despite growing up in Palos Verdes, I was not allowed to surf  
4 Lunada Bay. I suspect this was in part because I did not go to Palos Verdes  
5 High School. It seemed that people from Miraleste High School, were not  
6 allowed to set foot in Lunada Bay because we were considered outsiders.

7       4. When I was growing up, it was known that Lunada Bay was ruled  
8 by the Lunada Bay Boys. The Bay Boys would threaten, harass, and beat  
9 up all outsiders, and would vandalize their cars. They ruled with an iron fist.  
10 To my knowledge, there is no place in the world where the local surfers  
11 display the kind of hostility, aggression, or exclusionary attitude that the  
12 Lunada Bay Boys display.

13       5. The Bay Boys are very exclusive then and I believe they still are  
14 to this day. They treat Lunada Bay like it is their private property. They  
15 believe that it is their God-given right to own and protect Lunada Bay. It is  
16 my understanding that about 70 to 90 men are in the Lunada Bay Boys.  
17 This tight-knit group is comprised of older guys and their kids who are  
18 carrying on the legacy of exclusion. Only those who are in the group of  
19 Lunada Bay Boys are allowed to surf Lunada Bay. Outsiders are unable to  
20 simply "join" the Bay Boys. I could beg, plead, and offer money to the Bay  
21 Boys to be allowed to surf at the Bay, but they still would not allow me to join  
22 their ranks.

23       6. In my early twenties, I lifeguarded at city-owned pools in Watts, a  
24 rough town where well-known gangs like the Bloods and the Crips lived. I  
25 saw firsthand that Watts was a very dangerous place due to the gang  
26 violence. Nonetheless, I would feel safer playing a basketball game in Watts  
27 amidst the Bloods and Crips than I would trying to surf at Lunada Bay.

28       7. Although I knew that I would be hassled if I tried to surf Lunada

1 Bay, I attempted to surf there five or six times when I was a teenager and in  
2 my early twenties. During these occasions, I would get dropped off by  
3 friends so that my car would not be vandalized while I tried to surf. I did this  
4 because my friends' cars had been vandalized when they tried to surf at  
5 Lunada Bay. I also did not bring any belongings with me, like a backpack or  
6 even surf wax, because I knew that my belongings would be stolen or  
7 vandalized while I was surfing. On the walk down to the beach, the Bay  
8 Boys would verbally and physically abuse me and would get in my face. As  
9 a teenager, I was terrified to be bullied by men in their twenties and thirties.  
10 Once I got down to the beach and paddled out, I was threatened so severely  
11 that I stopped surfing before I was finished.

12 8. On one of the times I tried to surf Lunada Bay, I was harassed by  
13 one of the Bay Boys named Kelly Logan and his buddies. Logan was known  
14 as one of the "enforcers" who ruled Lunada Bay through fear, intimidation,  
15 and violence. Logan paddled up to me, got in my face, and yelled  
16 profanities like, "get the fuck out of here," "we'll beat your ass," "don't ever  
17 come back," and "you don't belong here." Logan also told me he was going  
18 to kill me. This intimidation scared me and convinced me not to try to surf  
19 Lunada Bay again.

20 9. I visit Palos Verdes every year because my mother still lives  
21 there. On one of my visits with my son about 10 years ago, I let my son ride  
22 one of my father's classic Harley Davidson motorcycles. Because my son  
23 was unfamiliar with the neighborhood, I followed him in my car so I could  
24 help him navigate around Palos Verdes. My son rode out to Lunada Bay,  
25 and was stopped by a Palos Verdes Estates police officer. The police  
26 asked my son if he was lost and if he knew where he was going. It was  
27 clear to me that the police only pulled over my son because he looked like a  
28 hardcore biker who did not belong in Palos Verdes Estates. When I got out

1 of my car to see what was going on, the police officer put his hand on his  
2 gun and asked me who I was and what business I had being in Palos  
3 Verdes. This was just one of the many examples I have heard about in  
4 which the Palos Verdes police participate in the intimidation of the Bay Boys.  
5 The Palos Verdes police officers help the Bay Boys kick out the "riffraff,"  
6 which in this instance, included my harmless son.

7 10. To my knowledge, the aggression and intimidation that I  
8 experienced thirty years ago and that my son and I experienced ten years  
9 ago is still ongoing. Although I visit my mother frequently, I do not visit  
10 Lunada Bay because it is unsafe for outsiders like us to go there. This  
11 angers me because I still surf all over, including in other parts of Palos  
12 Verdes, as well as in Hawaii and Mexico. The only way Lunada Bay would  
13 be a safe place would be to keep the Lunada Bay Boys away from it.

14 19. Lunada Bay is a public beach, and I hope to be able to visit it to  
15 surf without fear of physical and verbal attack as to me and my property. I  
16 want the aggressive Bay Boys and other locals to be barred from using this  
17 beach for sufficient time to change attitudes, and return this beach back to  
18 the public. In short, I want to be able to visit Lunada Bay without being  
19 harassed and to be safe in my person and property. And if I am harassed, I  
20 want the City of Palos Verdes Estates police to take my complaints  
21 seriously.

22  
23 I declare under penalty of perjury under the laws of the United States  
24 of America that the foregoing is true and correct.

25 Executed in Ashford, Connecticut on December 27, 2016.

26 

27 BLAKE WILL

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